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Established Maximum Residue Limit

EMRL2009-18

Coumaphos

(publié aussi en français)

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On 26 February 2008, Health Canada's Pest Management Regulatory Agency (PMRA) published and sought comments on maximum residue limits (MRLs) proposed for coumaphos in honey and honeycomb via Proposed Maximum Residue Limit PMRL2008-01, *Coumaphos*. A comment was received suggesting the need to establish an MRL for beeswax, as discussed in the corresponding Established Maximum Residue Limit EMRL2008-18, *Coumaphos*, published on 29 August 2008 which established MRLs for honey and honeycomb.

The PMRA agreed with the need for a beeswax MRL and a corresponding MRL was proposed in the consultation document published on 19 November 2008, Proposed Maximum Residue Limit PMRL2008-31, *Coumaphos*. Appendix I summarizes the comments received during the consultation process and provides the PMRA's response.

To comply with Canada's international trade obligations, consultation on the proposed MRL was also conducted internationally by notifying the World Trade Organization, as coordinated by the Standards Council of Canada. No comments were received as a result of the World Trade Organization consultation.

The comments received had no impact on the MRL for beeswax which is established as proposed in PMRL2008-31.

The following MRL is legally in effect as of the publication date of this document and is in addition to the MRLs already established for coumaphos.

Established Maximum Residue Limit for Coumaphos

Common Name	Residue Definition	MRL (ppm)	Food Commodity
Coumaphos	<i>O</i> -(3-chloro-4-methyl-2-oxo-2 <i>H</i> -1-benzopyran-7-yl) <i>O,O</i> -diethyl phosphorothioate, including the oxygen analog <i>O</i> -(3-chloro-4-methyl-2-oxo-2 <i>H</i> -1-benzopyran-7-yl) <i>O,O</i> -diethyl phosphate	1.0	Beeswax

A complete list of all MRLs established in Canada can be found on the Maximum Residue Limits for Pesticides webpage in the Pesticides and Pest Management section of Health Canada's website.

Appendix I Comment and Response

Comment

The comments noted that human exposure to coumaphos in beeswax could be oral, dermal or by inhalation. Articles were submitted outlining the concerns of coumaphos residues in beeswax. The comments concluded with the claim that both dermal (cosmetic use) and inhalation (beeswax containing candles) exposure to coumaphos "*should be examined for setting a beeswax MRL*".

Response

Pesticide maximum residue limits (MRLs) are established in/on food under the *Pest Control Products Act* for the purpose of the adulteration provision of the *Food and Drugs Act*. According to the submitted residue data, there is no expectation of quantifiable residues of coumaphos in beeswax, therefore an MRL of 1.0 ppm was proposed based on the method limit of quantitation for beeswax. While non-dietary exposure (dermal and inhalation) is not covered under the MRL, dermal and inhalation exposure are considered in the occupational exposure assessment, to ensure that workers handling the product will be protected. At the time of the evaluation of the request, dermal exposure to workers handling coumaphos-impregnated strips or handling coumaphos-contaminated beeswax was deemed acceptable. No inhalation exposure is expected to occur since coumaphos is not considered volatile. Therefore, it is anticipated that the dermal and inhalation exposure of the general public to coumaphos residues in beeswax will be considerably lower in comparison to the exposure to workers.

